

WaterSense Program Guidelines

I. General Program Information

A. Program Overview

WaterSense is a public-private partnership program sponsored by the U.S. Environmental Protection Agency (EPA) created to protect the future of our nation's water supply by promoting and enhancing the market for water-efficient products and programs. The WaterSense program's goal is to conserve water resources for future generations and reduce water and wastewater infrastructure cost. WaterSense seeks to provide credible information on water-efficient products and practices, raise awareness about the importance of water efficiency, ensure water-efficient product performance, help consumers differentiate products and programs that use less water, promote innovation in product development, and support state and local water efficiency efforts.

B. Authority

- Sections 104(a) and (b) of the Clean Water Act (CWA) broadly authorize the U.S. Environmental Protection Agency (EPA) Administrator to “establish national programs” for the reduction of pollution, which may include cooperation with, encouragement of, and assistance for public and private efforts to prevent, reduce, and eliminate pollution.
- Section 104(o) of the CWA also authorizes the EPA Administrator to conduct research on methods of reducing the total flow of sewage, including unnecessary water consumption, which is a recognition by Congress that water consumption is directly related to sewage flow and thus to potential water pollution.
- Sections 1442(a)(1) and (2) of the Safe Drinking Water Act (SDWA) authorize the EPA Administrator to provide demonstrations relating to the provision of a dependably safe supply of drinking water. Because both a dependable and a safe supply of drinking water depend on water availability, water conservation demonstrations could be authorized under these sections.

C. Program Philosophy

WaterSense has adopted an overarching program philosophy, or principles, that will guide EPA in selecting products for evaluation, developing product specifications, and determining label use, partner status, leader recognition, and marketing efforts.

WaterSense labeled products:

- Will realize water savings on a national basis.
- Perform as well as or better than their less efficient counterparts, assuming proper installation and operation. Products will be easy to use and find, requiring no

consumer sacrifice in terms of convenience, comfort, hygiene, health, safety, or availability.

- Achieve water efficiency through several technology options, at least one of which is non-proprietary.
- Will effectively be differentiated by a label that is visible for purchasers. Typically, the specification is set to label products that are at least 20 percent more efficient than their less efficient counterparts.
- Are independently certified by a third party to confirm that the product meets EPA criteria for efficiency and performance.
- Provide measurable results, quantifiable in terms of water saved/water use avoided compared to less efficient models, as well as level of desired performance achieved.

Certification programs labeled by WaterSense:

- Must also demonstrate a higher level of efficiency requirements or achievements than their peers, though not a specific percentage.
- Should provide quantifiable results in terms of water savings in order to differentiate themselves in the marketplace, to the extent possible.
- Should be easy to find, identify, and use, and should not require end-user sacrifice in terms of convenience, comfort, hygiene, health, or safety.
- In the case of professional certification and/or education programs, verified knowledge of water-efficient principles and procedures must be a key component.

D. Roles and Functions

To achieve the mission of the WaterSense program, EPA establishes partnerships with interested stakeholders, such as product manufacturers, retailers, and water utilities. EPA provides and maintains the WaterSense brand and develops national specifications for water-efficient products and programs. Partners develop products and programs meeting the specifications and promote and distribute them to customers. Partners also assist EPA in promoting water efficiency, in general, as well as the WaterSense brand, specifically. Following are the roles anticipated for each participant category (for more information about partnership eligibility, see the *Partner Types/Eligibility Section*):

- EPA:** Sponsors WaterSense, promotes the WaterSense brand and water efficiency, recruits partners, updates stakeholders on the program, develops product and program specifications, develops requirements for accredited third-party product certification bodies, evaluates applications, signs partnership agreements, maintains the Web registry of labeled products and certification programs, monitors usages of the WaterSense program logo and label, and recognizes participants.
- Manufacturers** (companies that produce or private label products that meet WaterSense specifications): Promote technology, improve performance, make products certified to WaterSense criteria, advertise/promote, and provide market data.

- iii. **Product Certification Bodies:** Independent conformity assessment bodies that are either accredited in accordance with the WaterSense certification scheme, or otherwise approved for that purpose by WaterSense, evaluate products upon application by manufacturers, certify those that meet WaterSense specifications, and authorize and monitor the use of the WaterSense label in conjunction with certified products.
- iv. **Professional Certifying Organizations:** Sponsor professional certification programs that meet WaterSense criteria, provide water efficiency education, promote WaterSense partnerships to certified professionals, and help market WaterSense and water efficiency.
- v. **Retailers/Distributors:** Provide shelf space and in-store promotion and identification of WaterSense labeled products, train sales staff, conduct consumer workshops, encourage cross-promotion and advertising/discounts, and provide sales data where appropriate.
- vi. **Utilities, Water Boards, Local Governments:** Support water conservation and efficiency programs, promote the WaterSense brand through education and awareness, sponsor rebates and financial incentives, conduct public outreach and business education, and provide water supply and conservation program data.
- vii. **Associations, Non-Profit Organizations, and State Government Agencies:** Conduct education and awareness campaigns, participate in bulk purchasing, endorse/adopt/promote the WaterSense program, assist EPA with recruitment, publish materials, provide data, and conduct member surveys.
- viii. **Businesses and Institutions:** Purchase products, use/test technology, promote and incorporate water efficiency in their facilities, and provide data.
- ix. **Federal Government (e.g., HUD, DVA, USGS, Interior, OFEE):** Participate in bulk purchasing, incorporate WaterSense requirements into procurement language, lend name in partnership, and leverage resources.
- x. **Contractors, Plumbers, Remodelers, Irrigation and Landscape Professionals:** Use and promote technology, obtain certification, and conduct consumer education.

II. Product Labeling

A. Specifications

The required attributes of products that are allowed to bear the WaterSense label are described in product specifications developed by EPA. Specifications describe the attributes of products that can be WaterSense labeled. Specifications will generally describe both water use and product performance attributes and will be developed with stakeholder input. EPA will typically

prepare draft specifications based on market research and informal discussions with industry. Once a draft specification is available, EPA will make it public via the program's Web site and request comment through conference calls and public meetings. EPA also welcomes written feedback on draft specifications. The draft specifications will be refined based on these comments and feedback and then released again in either draft or final form. The number of rounds of public review before the specification is finalized will depend on the nature and extent of comments on the prior draft. EPA will consider all comments on key technical issues and requirements in the final specifications, as it strives to maintain a balance between environmental benefits and market factors. EPA will have the ultimate authority in setting specification requirements, after carefully considering all stakeholder input.

B. WaterSense Label Requirements for Products

The WaterSense label, as described above, was created to differentiate products in the marketplace that meet EPA criteria for efficiency and performance. The mark itself must look significantly different from the WaterSense program logo. There are several prerequisites/limitations for use of the label (for more details, see the *WaterSense Label Guidelines*):

- The manufacturer wishing to use the label must have signed a partnership agreement with EPA.
- Any product to which the label is applied must be certified to conform to the relevant WaterSense specification by a body either accredited in accordance with the WaterSense certification scheme or otherwise approved for that purpose by WaterSense.
- The manufacturer must have applied for and received approval to use the WaterSense label through the procedures described in *Appendix A*.
- The label may be used on product cartons and packaging or adhered directly to the product.
- The label may be used in promotional literature published about the product by the manufacturer, its wholesalers, distributors, or retailers, as long as it is in direct correlation to the product, but it must not be used to signify WaterSense labeling of every product from the manufacturer, wholesaler, distributor, or retailer.
- The WaterSense label may never be used to imply direct endorsement of a manufacturer or product by EPA.
- If the WaterSense label is withdrawn for any reason, the manufacturer and its wholesalers, distributors, and retailers must immediately cease to use the mark in conjunction with that product, and the label must be eliminated from product packaging/promotional materials within six months from the date of withdrawal notification.
- The label may never be used in connection with products that have not met the WaterSense criteria for efficiency and performance, nor for products for which a final product-specific specification does not exist.

C. WaterSense Label Suspension and Withdrawal from Products

The WaterSense label will be suspended or withdrawn from a product if it is found not to conform to the relevant WaterSense specification and/or label use guidelines. Specifically, use of the WaterSense label on a product will be suspended by the product certification body for

product nonconformance identified during ongoing surveillance, improper use of the WaterSense label on products or promotional materials, or infringement of the WaterSense certification scheme. Use of the label on a suspended product can resume once the areas of concern are corrected, to the satisfaction of the product certification body. The WaterSense label will be withdrawn from a product for more severe or repeated instances of product nonconformance or misuse of the WaterSense label. Such WaterSense label withdrawal also can trigger termination of the partnership agreement by EPA. Products with a withdrawn WaterSense label will not be reinstated into the program. Procedures describing WaterSense product label suspension and withdrawal are described in further detail in *Appendix A*.

D. WaterSense Label Monitoring, Violations, Enforcement, and Discontinuation

Proper use of the WaterSense label on products and product packaging will be monitored and enforced by EPA and/or the product certification bodies that certify WaterSense products.

In order to ensure the integrity of the WaterSense brand and as a service to assist manufacturers with proper use of the WaterSense label, EPA allows each participating manufacturer to provide pre-print samples of any promotional materials or Internet files used to promote its WaterSense labeled product(s), whether at the manufacturer, wholesaler, distributor, or retailer level. EPA will provide prompt review (within five business days) of any pre-print materials provided to the Agency for quick turnaround review prior to publishing.

Violations of the proper use of the WaterSense label include, but are not limited to:

- Use of the label in conjunction with products that are not certified to WaterSense specifications.
- Use of the label on promotional materials that falsely imply every product on that page/within that section/in that promotional piece meets the WaterSense criteria.
- Use of the WaterSense program or partner logo (not label) to promote a product.

EPA reserves the right to collect samples of WaterSense labels used or promotional materials including the label. For any of the above violations that come to EPA's attention, the Agency will notify the product certification body that authorized the use of the WaterSense label for the product in question. The product certification body will then engage in investigation and resolution of the complaint in accordance with ISO Guide 65 and the product certification body's policies and procedures. Manufacturers may not, under any circumstances, continue to use the WaterSense label in conjunction with products for which the WaterSense label has been suspended or withdrawn.

E. Revisions to WaterSense Product Specifications

EPA reserves the right to revise WaterSense product specifications should technological and/or market changes affect the usefulness of current specifications to consumers, industry, or the environment. Revisions to specifications would only be made following the open process described above, including discussions with industry and other interested partners, and would require re-certification to the new specifications. It is anticipated that revisions would occur over a period years, and reflect the evolution of water-efficient products.

F. Recognition

One of EPA's core goals through WaterSense is to promote innovation in product development and raise awareness about the importance of water efficiency. As part of accomplishing these goals, from time to time EPA may see fit to recognize program partners, promote particular products, and provide more in-depth information than is available on the WaterSense Web registry.

By signing the partnership agreement, participants agree to allow their organization and product name to be used in conjunction with WaterSense. EPA reserves the right to list manufacturers, product names, retailers, and other organizations in conjunction with product-specific promotions. Should EPA require additional information to develop a case study on a particular product, the Agency will contact the manufacturer directly for an interview and allow for pre-publishing review. No confidential business information will be published at any time in this process.

III. Professional Certification Program Labeling

A. Specifications

The required attributes of certification programs that can be promoted as WaterSense labeled programs are described in the WaterSense certification program specifications. Specifications describe the attributes of the programs and the program development process that must be followed to demonstrate and document that a program is compliant with the attributes described in the specification. Specifications generally describe criteria to be met by each certification program and are developed with stakeholder input. EPA typically prepares draft specifications based on market research and informal discussions with interested stakeholders. Once a draft specification is available, EPA makes it public via the program Web site and requests comment through conference calls and public meetings. EPA also welcomes written feedback on draft specifications. The draft specifications are refined based on these comments and feedback, and then released again in either draft or final form. The number of rounds of public review before the specification is finalized will depend on the nature and extent of comments on the prior draft. EPA has the ultimate authority in setting specification requirements, after carefully considering all stakeholder input.

B. Labeling Process, Timing, Requirements, and Notification

Organizations wishing to achieve the WaterSense label for a certification program must first complete and sign a WaterSense partnership agreement with EPA, then complete an application packet, including the documentation detailed in the WaterSense specification applicable to their certification program. EPA will accept forms submitted via e-mail, fax, and mail. Within five business days, EPA (or its agent) will acknowledge receipt of the application packet. Within four weeks, EPA will notify applicants of the Agency's acceptance or rejection of the certification program for WaterSense labeling.

Potential reasons for rejection include incomplete application information, failure to meet required/specified criteria for that certification program category, submissions received prior to

the release of the final specification for the certification program category, or failure to submit a WaterSense partnership agreement prior to submitting the application packet. If an application is rejected, explanation on the application deficiencies will be provided. EPA will update the WaterSense Web registry on a monthly basis to add newly recognized certification programs. EPA will not publish information about non-qualifying certification programs. Partners are responsible for informing EPA when their programs are no longer available or are no longer compliant with WaterSense specifications and should be removed from the Web registry.

C. WaterSense Labeling Requirements for Certification Programs and Professionals

EPA's WaterSense label, as described above, was created to differentiate certification programs in the marketplace that meet EPA criteria for water efficiency. There are several prerequisites and limitations for use of the WaterSense label (for more information, see the *WaterSense Label Guidelines*):

- The professional certifying organization wishing to use the label must have signed a partnership agreement with EPA.
- The professional certifying organization must have applied for and been accepted to use the WaterSense label, through the procedures described above.
- The certification program for which the label is used must meet or exceed the WaterSense criteria for that type of certification program.
- EPA must have contacted the professional certifying organization to provide its acceptance for using the WaterSense label.
- The WaterSense label can be used on promotional literature, advertisements, Web sites, and training and testing materials for certification programs that receive acceptance.
- The label may not be used to imply direct endorsement of a certification program or organization by EPA.
- If a certification program is disqualified from EPA's WaterSense program for any reason, the professional certifying organization must immediately cease to use the label in conjunction with that certification program, and the label must be eliminated from all promotional materials within six months.
- The label may never be used in connection with certification programs that have not met the appropriate WaterSense criteria, nor for certification programs for which a final specification does not exist.

Individuals who become certified under a WaterSense labeled certification program are not allowed to use the WaterSense label directly on their business cards, vehicles, promotional materials, etc.; however, there is a process by which certified professionals who achieved their certification from WaterSense labeled programs can apply to become WaterSense partners and use the WaterSense partner logo, as described in the *Partner Logo Guidelines*. EPA will also add partners that are certified under a WaterSense labeled program to its WaterSense Web registry. Under no circumstances can those individuals promote themselves or their work product as being certified and/or endorsed by EPA or the WaterSense program, however.

D. Disqualification of WaterSense Labeled Certification Programs

Labeled certification programs may be disqualified from the WaterSense program after presentation and evaluation of credible evidence that the certification program does not conform to the applicable WaterSense specification. EPA staff will evaluate evidence that supports claims of nonconformance. If there is sound, credible evidence that the certification program does not conform to the specification, EPA will submit a request to the professional certifying organization seeking explanation and satisfactory resolution to the issue. The professional certifying organization will have 20 days to successfully resolve the nonconformance issue, or refute the claim of nonconformance with sound, credible supporting evidence. If not satisfactorily addressed within that timeframe, the certification program in question will be disqualified and removed from the Web registry of WaterSense labeled certification programs, as will WaterSense partners who are professionals certified under that program. Such disqualification also may trigger termination of the partnership agreement of the professional certifying organization and the professionals certified under that program, as described in the dispute resolution discussion in *Section V*.

E. Requalification of WaterSense Labeled Certification Programs

Disqualified certification programs may be requalified into the program, upon submittal of a new application package. The application for requalification should be supported with documentation proving that the factors leading to initial disqualification have been remedied. Certification programs will be requalified, at EPA's discretion, upon such a successful demonstration.

F. WaterSense Label Monitoring, Violations, Enforcement, and Discontinuation

EPA requests that each participating professional certifying organization provide pre- or post-print samples of any promotional materials or Internet files using the WaterSense label to promote its recognized certification program, and that certified professionals using the WaterSense partner logo to promote their certification do the same. EPA will provide prompt review (within five business days) of any pre-print materials provided to the Agency for quick turnaround review prior to publishing.

Violations to the proper use of the WaterSense label include, but are not limited to:

- Use of the label in conjunction with certification programs that have not successfully completed the application process.
- Use of the label in conjunction with a program for which no current specification exists.
- Use of the label (instead of the approved partner logo) on promotional materials of certified professionals.
- Use of the approved partner logo in conjunction with an entire company or professionals who are not all certified under WaterSense labeled programs.

For any of WaterSense label (or partner logo) violations that come to EPA's attention, the Agency will send to the professional certifying organization (or certified professional) a letter asking that improper uses cease immediately. EPA may request proof of such a change within 90 days of the request.

In the event that improper use of the WaterSense label continues, EPA may disqualify from using the label any or all of the professional certifying organization's program(s), until such time as the issue has been resolved. Professional certifying organizations may not, under any circumstances, continue to use the WaterSense label in conjunction with disqualified certification programs.

G. Revisions to Specifications

EPA reserves the right to revise certification program specifications should technological and/or market changes affect the usefulness of current specifications to consumers, practicing professionals, or the environment. Revisions to specifications would only be made using the same public process described above, including discussions with affected professional organizations and other interested partners. Currently labeled programs would have to reapply for the WaterSense label under the new specifications. It is anticipated that revisions would occur over a period of years, and reflect the evolution of water-efficient certification programs.

H. Public Recognition

One of EPA's core goals through the WaterSense program is to promote water efficiency in relevant certification programs and raise awareness about the importance of saving water. As part of accomplishing these goals, from time to time EPA may see fit to recognize program partners, promote particular certification programs, recognize certified professionals, and provide more in-depth information than is available on the Web registry.

By signing the partnership agreement, participants agree to allow their organization and certification program name or certified professionals to be used in conjunction with EPA's WaterSense program. Should EPA require additional information to develop a case study on a particular certification program, the Agency will contact the professional certifying organization or certified individuals directly for an interview and allow for pre-publishing review. No confidential business information will be published at any time in this process.

IV. Partnerships

As described above, EPA partners with numerous organizations to ensure the success of the WaterSense program.

A. Partner Types/Eligibility

The following categories reflect the types of organizations that are eligible to become partners in the WaterSense program.

Professional Certifying Organizations: Any organization that sponsors a professional program that meets WaterSense specifications for certification programs.

Promotional Partners: Promotional partners assist EPA in educating others about the value of water, water efficiency, and the WaterSense brand. These partners include:

- **Nonprofit Organizations** such as environmental organizations, nonprofit certifying organizations, academic institutions, and consumer advocacy groups.
- **Professional and Trade Associations** whose members are eligible to join as a WaterSense partner may also participate as promotional partners. For example, since water utilities are eligible for partnership, the American Water Works Association, whose membership includes 4,700 utilities, is also eligible.
- **Utilities/Water Districts/Government Agencies** (state, local, and federal agencies) such as environmental departments, municipal programs, water agencies, water districts, wholesalers, public utilities, private utilities, wastewater treatment facilities, water boards, and public utility commissions.

Manufacturers: Companies that manufacture or private label any product(s) that meet WaterSense specifications.

Retailers/Distributors: Any retail or wholesale distribution organization selling WaterSense labeled products, including but not limited to home improvement stores, hardware stores, appliance retailers and distributors, plumbing supply houses, decorator showrooms/specialty stores, and commercial irrigation distributors.

Certified Professionals: Individuals who have been certified under a WaterSense labeled program and who provide services consistent with WaterSense specifications.

WaterSense plans to add additional categories of partners, including home builders, contractors (e.g., plumbers and remodelers), and other businesses and institutions that use water as the program develops.

B. Partnership Agreements

Each organization interested in promoting the WaterSense brand, earning the WaterSense label for its products, working with EPA to promote sales of WaterSense products, and labeling certification programs that promote water efficiency (as well as certified professionals under WaterSense labeled programs interested in promoting water efficiency) are required to sign a WaterSense partnership agreement with EPA. Partnership agreements are tailored to each partner type and outline the requirements of participating in the program for each category type. Each organization or certified professional signing a partnership agreement agrees to uphold the requirements of the guidelines for use of the WaterSense program logo, partner logo, or WaterSense label, as appropriate.

WaterSense partnership agreements include the goals described above, a partner pledge, EPA's commitment to WaterSense partners, and general terms and disclaimers. The partner pledge varies slightly, depending on the type of partner. The following table briefly describes the differences in expectations for different partner types, as well as EPA's commitment to partners:

Partnership Pledge:	Certifying Organizations	Manufacturers	Nonprofit Organizations	Retailers & Distributors	Certified Professionals	Trade Associations	Utilities & Governments
Label product(s) or program(s)	x	x					
Promote value of water efficiency and WaterSense products/programs	x		x	x	x		x
Sell, market, and promote WaterSense labeled products		x		x	x		
Encourage eligible constituents to participate in WaterSense	x		x			x	
Provide data on sales of labeled products		x		x		x	
Provide annual data about water sold							x
Provide data on WaterSense labeled products carried	x			x			
Train staff on WaterSense program				x			
Adhere to program/partner logo or label guidelines	x	x	x	x	x	x	x
Feature WaterSense on Web site/related promotional materials	x	x	x	x	x	x	x
Update EPA on availability of labeled products	x	x					
Allow EPA to promote partner's participation in program	x	x	x	x	x	x	x
EPA Commitments:							
Develop national specifications for water-efficient products/programs	x	x	x	x		x	x
Increase awareness of water efficiency and the WaterSense brand	x	x	x	x	x	x	x
Provide current WaterSense program news	x	x	x	x	x	x	x
Provide public recognition to partners	x	x	x	x	x	x	x
Respond swiftly to partner requests for information	x	x	x	x	x	x	x
Provide materials, templates, and logo or label for promotional use	x	x	x	x	x	x	x
Review WaterSense promotional materials developed by partner	x	x	x	x	x	x	x
Provide tools for training sales staff on WaterSense labeled products				x			

The general terms and disclaimers are consistent across all partnership agreements:

- The partner will not construe, claim, or imply that its participation in the EPA WaterSense program constitutes federal government (EPA) approval, acceptance, or endorsement of anything other than the partner's commitment to the program.
- The partner understands that the activities it undertakes in connection with the program are voluntary and not intended to provide services to the federal government. As such, the partner will not submit a claim for compensation to any federal agency.

- Manufacturers, retailers, distributors, and professional certifying organizations may not sign WaterSense partnership agreements with EPA unless there has been a draft specification released for a product they produce/carry or for a relevant professional program.
- The partner and WaterSense will assume good faith as a general principle for resolving conflict and will seek to resolve all matters informally, so as to preserve maximum public confidence in the program.
- Failure to comply with any of the terms of this partnership agreement can result in its termination and cessation of access to the benefits of the program, including use of the WaterSense label or partner logo.
- WaterSense will actively pursue resolution of noncompliance related to the use of the program label and logo(s).
- Both parties concur that this agreement is wholly voluntary and may be terminated by either party at any time, and for any reason, with no penalty. Termination will begin effective immediately upon written notice to or from the EPA WaterSense Program. Upon termination from the program, partners agree to remove the WaterSense label and/or logo in a timely manner, consistent with the WaterSense program and partner logo and label guidelines.

Certain partners, such as utilities; retailers; nonprofit organizations; and state, regional, and local governments, may not be eligible to certify products or qualify programs for the WaterSense label, but may serve as promotional partners who can help build the WaterSense brand and promote the need for water efficiency. These partners will be eligible to use the WaterSense program logo and related materials, according to guidelines specifically for that purpose.

C. Recognition

From time to time, EPA may see fit to recognize WaterSense partners for their achievements in manufacturing, promoting, and using water-efficient products and practices. By signing a partnership agreement, each partner agrees to share information, when appropriate, with EPA and allows the Agency the right to publish its partner status on the WaterSense Web site. For more in-depth case studies, awards, and other promotions, EPA will allow partners to review information before it is made public.

EPA commits to all partners that it will provide WaterSense partners with public recognition for their involvement in the program and role in protecting the environment through online listing of partners, special awards, and other efforts. This recognition includes, but is not limited to, listing partners and labeled products and programs on the EPA WaterSense Web registry. In future years, EPA plans to develop an awards program to recognize stellar partner accomplishments in different program areas.

D. Dispute Resolution

Partners and EPA will assume good faith as a general principle for resolving conflicts under the WaterSense program. Both parties will endeavor to resolve all matters informally, so as to preserve maximum public confidence in the WaterSense program.

In the event informal channels do not produce a mutually agreeable resolution to a matter in dispute, either party should notify the other in writing as to the nature of the dispute, the specific corrective action sought, and their intent to terminate the partnership agreement, either as a whole or in part, unless specific corrective actions sought are undertaken. Within 20 days of receiving formal notification from EPA indicating intent to terminate the partnership agreement, either as a whole or in part, the partner should reply, agreeing to either (1) undertake in a timely and effective manner the corrective actions sought by EPA, or (2) terminate the partnership agreement.

Within 20 days of receiving formal notification from the partner indicating its intent to terminate the partnership agreement, either as a whole or in part, EPA will reply either by (1) agreeing to undertake in a timely and effective manner the corrective actions sought by the partner, or (2) explaining why such corrective actions cannot be undertaken.

If the partner fails to respond within 20 days of receiving formal notification of EPA's intent to terminate the partnership agreement, either as a whole or in part, or if the partner responds but does not agree to undertake corrective actions sought by EPA, or if the partner agrees but does not initiate the corrective actions in a timely manner, the partnership agreement will be terminated, either as a whole or in part.

V. Measurement, Data Reporting, and Confidential Business Information

A. Program Measurement

To measure the progress and impact of its WaterSense program and water-efficient products and practices, EPA will collect in-house data, primarily on the activity-level (or output) measures involved with WaterSense, including number of program partners, number of final specifications completed, number of individual products certified and labeled by manufacturers, number of professionals certified through WaterSense labeled programs, number of Web user sessions/pages viewed, and number of WaterSense helpline calls.

The Agency will supplement in-house data with data from WaterSense partners and surveys of other audience groups (e.g., consumers, commercial businesses, and institutions) in order to track change in awareness and understanding of the WaterSense label; track change in marketshare for labeled versus non-labeled products; measure water saved through WaterSense labeled products; determine water/wastewater infrastructure costs avoided; calculate cost savings to residential, commercial, and institutional water users; study consumer satisfaction with water-efficient products; and review national per capita water usage.

B. Data Reporting

EPA will rely on partners to provide much of the data described above. Specifically, WaterSense asks selected partners to submit the following data on an annual basis:

- **Product Data:** Manufacturers agree to make data or other marketing indicators available to EPA on an annual basis to assist in determining the market penetration of WaterSense labeled products, including unit shipment data, sales data, and, where appropriate, aggregate product data. For example, manufacturers may be asked to provide unit shipment data for WaterSense labeled products, total unit shipments for each model in the product line, and percent of total unit shipments that are WaterSense labeled. These data may be provided directly to EPA or to a third-party organization with the understanding that individual manufacturer data will not be released, but rather aggregated industry-wide to define the relative market share of labeled versus non-labeled products.
- **Sales Data:** Retailers agree to provide data to EPA on sales of water-efficient products or other market indicators to assist in determining the impact of the program in promoting labeled products. The data will be used by EPA only for program evaluation purposes and may be handled as confidential business information (see *Section D* below), upon request.
- **Utility Data:** WaterSense also asks utility and government partners to report data on results of promotional activities, aggregate data on rebates offered (e.g., number of rebates processed), and water sales data (e.g., gallons of water sold, price per gallon, gallons of wastewater treated). EPA will use these data to inform future rebates, document water savings associated with rebate programs, and assess changes in water consumption over time.

EPA will use this information to estimate the annual water savings associated with the program and calculate the associated environmental and economic benefits associated with this water savings. It will also use these figures to calculate the program's efficiency.

C. Ongoing Product/Program Qualification

On an annual basis, EPA requests that manufacturers update EPA on the status of all WaterSense labeled products. In particular, EPA requests that manufacturers tell EPA if each product is still produced or whether it has been modified or discontinued. In addition to status information, partners are also asked to submit the following information annually for each WaterSense labeled product:

- Product name (make and model)
- Date of market launch
- Date of market withdrawal
- Number of products shipped

As necessary, EPA will also request data of professional certifying organizations and certified professionals to determine implementation status of the WaterSense labeled professional certification programs.

D. Confidential Business Information

EPA understands that, as part of their participation in this program, partners may provide the Agency with confidential business information (CBI), including sales data, test results, and examinations for certification programs. Any item designated as “confidential business information” by a participant in the WaterSense program will be handled through EPA’s pre-determined CBI procedures, including assurance that the information will not be made public, included on the WaterSense Web site, or shared with other program participants. Information such as certification examinations that must be tracked and monitored by participants will be returned to the sender as soon as practicable. Procedures may be added as needed to protect participant confidentiality requirements.

VI. Definitions

Certification Program or Professional Certification Program: A program that requires a combination of experience and testing to verify a professional’s knowledge.

Certified Professional: An individual who has been certified under a WaterSense labeled program and who provides services consistent with relevant WaterSense specifications.

High-Efficiency: A measurement of product performance, typically established through testing to a specification, that considers both water use and product function. WaterSense labeled products will generally show a 20 percent or more reduction in water use compared to baseline products, with no sacrifice in performance or user satisfaction.

Labeling: The act of applying the WaterSense label (see below) to products, product packaging, and accompanying promotional materials to market a specific product.

Manufacturer: Any organization that produces a product for market that might be eligible to meet WaterSense criteria for efficiency and performance. Manufacturers may also produce “private label” products that are sold under the brand name of a separate organization, which is treated as a separate partner/application from the original product manufacturer. *See also Partner Types/Eligibility Section.*

Nonprofit Organization/Trade Association: *See Partner Types/Eligibility Section.*

Partner: Any organization that voluntarily signs a partnership agreement with EPA to participate in WaterSense. *See Partner Types/Eligibility Section.*

Partnership Agreement: The formal agreement between EPA and its WaterSense partners that delineates activities to be conducted by each party, benefits, and exclusions. Partnership agreements are signed by appropriate representatives at EPA and organizations outlined in the *Partner Types/Eligibility Section*.

Performance Criteria: A benchmark by which products are measured for both water efficiency and functionality for intended use. Performance criteria may address water use, flow capacity, efficiency, or other product functions and other factors.

Private Label Product: Any product produced by a manufacturer for labeling under a separate organization/brand from the manufacturer's; private label products will be treated as separate from a manufacturer's products for purposes of partnership agreement signing and application for the WaterSense label.

Product: Merchandise, ware, or commodity offered for sale. WaterSense plans to consider including the following categories of products during the lifetime of the program: commercial and residential plumbing products, commercial and residential irrigation products (controllers, sensors), and other mechanical and commercial water-using products and processes.

Product Certification Body: An independent conformity assessment body that is either accredited in accordance with the WaterSense certification scheme or otherwise approved for that purpose by WaterSense.

Product Promotional Materials: Brochures, advertisements, flyers, catalogs, circulars, Web sites, displays, and related materials used to sell products.

Professional Certifying Organization: An organization that certifies individuals on a professional level. A certifying organization's certification program can earn the WaterSense label if it meets the WaterSense specification for certification programs.

Retailer/Distributor: See *Partner Types/Eligibility Section*.

Service Area: Work areas that are conducted by one or more persons that benefit another person or group, including irrigation professionals, landscapers, and other individuals.

Specifications: Describe the water use and product performance attributes of products eligible to bear the WaterSense label, as well as how the attributes should be measured.

Utility/Government Agency: See *Partner Types/Eligibility Section*.

WaterSense Label: A service mark pending registration from the U.S. Patent and Trademark Office that contains the words "WaterSense" and "Meets EPA Criteria" in a circular pattern around the EPA WaterSense graphic "water drop" image. As described in more detail in the *Program Label Guidelines*, the WaterSense label may be used on product packaging and labeling or directly imprinted on or adhered to the product, to demonstrate that the product meets WaterSense criteria for efficiency and performance. It can be used on manufacturer, distributor or retailer brochures, advertisements, trade show displays, Web sites,

or point-of-purchase materials, to distinguish a WaterSense labeled product, and program materials, brochures, or Web sites of certification programs or other services that meet WaterSense criteria.

WaterSense Labeled Product: A product that has been independently certified and found to meet WaterSense criteria for efficiency and performance, as defined in product-specific specifications and described in *Appendix A*.

WaterSense Labeled Certification Program: A program (e.g., certification program for irrigation professionals) that has been approved by EPA as meeting WaterSense criteria outlined in program-specific specifications.

WaterSense Label Suspension: Temporary invalidation of product certification and subsequent WaterSense labeling as a result of product nonconformity, improper use of the WaterSense label, or infringement of the WaterSense certification scheme. The manufacturer is prohibited from identifying as certified or associating the WaterSense label in conjunction with a product for which the WaterSense label has been suspended.

WaterSense Label Withdrawal: Revocation of product certification and use of the WaterSense label as a result of severe or repeated instances of product nonconformance or misuse of the WaterSense label. The manufacturer is prohibited from identifying as certified or associating the WaterSense label in conjunction with a product for which the label has been withdrawn and is ineligible for reinstatement of the WaterSense label for the product in question.

WaterSense Program Logo: A logo defined by a combination leaf/water droplet and the words “WaterSense” and “EPA” used to promote and brand the WaterSense program.

WaterSense Partner Logo: A logo made up of the WaterSense program logo and the word “Partner,” for use by organizations or individuals that have signed partnership agreements with EPA. The logo may not be used for WaterSense labeled products or certification programs.

Web Listing/Registry: A listing of WaterSense labeled products and programs on the EPA Web site, including name/model numbers of products, certification programs, certified professionals that are WaterSense partners, and links to manufacturers, organizations, or individuals.

WaterSenseSM Program Guidelines

Appendix A – Interim¹ WaterSense Product Certification and Labeling Procedures

This appendix is meant to supplement the *WaterSense Program Guidelines* and specifically outlines the interim process for WaterSense product certification and labeling, including the general procedures for manufacturers application and receipt of authorization to use the WaterSense label on products. This appendix also describes the interim general procedures for product certification body application and approval to certify and authorize the use of the label on products for WaterSense.

I. WaterSense Product Certification and Labeling Procedures for Manufacturers

A. Partnership Agreements with EPA

Manufacturers must first sign a partnership agreement with EPA as described in *Section IV* of the *Program Guidelines* if they wish to apply the WaterSense label to a product.

B. Selection of an Approved Product Certification Body

In order to use the WaterSense label on a product, manufacturer partners must have their products certified for conformance to the relevant WaterSense specification by a product certification body either accredited in accordance with the WaterSense certification scheme or otherwise approved by EPA for that purpose.

EPA intends to develop an American National Standards Institute (ANSI) accredited third-party certification program for WaterSense labeled products (hereafter referred to as WaterSense accreditation). This WaterSense accreditation program is expected to be in effect by March 2008. In the interim, as the full WaterSense accreditation requirements are developed, WaterSense will rely on current ANSI accredited product certification bodies to certify products in accordance with their existing certification schemes and authorize the use of the WaterSense label (hereafter referred to as interim approval).

Each product certification body that is approved by EPA during the interim period or ultimately fully accredited by ANSI to the WaterSense certification scheme will certify conforming products and authorize the use of the WaterSense label.

EPA anticipates that a listing of product certification bodies that are approved by EPA to certify products for WaterSense will be posted on the WaterSense Web site along with the specific WaterSense specifications for which they are approved to perform certifications. This

¹ EPA is in the process of developing an American National Standards Institute (ANSI) accreditation program for third-party product certification bodies that will certify products for WaterSense. This Appendix describes the interim certification process and requirements that product certification bodies and manufacturers shall adhere to until the ANSI accreditation program for WaterSense is fully established.

information may also be obtained from the WaterSense helpline at 866-WTR-SENSE (866-987-7367). The initial approved list of product certification bodies should be available by early 2007. The interim approval of product certification bodies will be effective from the initial date of posting until the ANSI accreditation of product certification bodies to the WaterSense certification scheme is fully developed and implemented. EPA anticipates that interim approval of product certification bodies will terminate in April of 2008.

Once the full WaterSense accreditation process is established, only a product certification body accredited by ANSI in accordance to the WaterSense certification scheme will be able to certify products to demonstrate that they meet WaterSense specifications. The interim approval process will no longer be applicable.

C. Product Certification and Labeling

Achieving and using the WaterSense label in conjunction with water efficient products is contingent upon product certification and ongoing assessment of product conformance by an approved product certification body. Figure A-1 (see page 26) portrays the key elements of the product certification process and the relationships between EPA, the product certification body, and the manufacturer partner.

i. Application Submission to a Product Certification Body

Manufacturer partners must select and submit an application to a product certification body that is approved by EPA for the relevant WaterSense specification(s). Each product certification body will have its own application and application procedures. The product certification body that is selected should be contacted directly for more information.

ii. Product Submission for Testing

Under the interim approval, each product certification body will certify products in accordance with its existing ANSI accredited certification scheme and the relevant WaterSense specification. Upon implementation of ANSI's WaterSense accreditation, the product certification body will certify products in accordance with the WaterSense certification scheme and the relevant WaterSense specification.

iii. Authorization to Use the WaterSense Label

Once the product certification body has certified that the product conforms to the relevant WaterSense specification, it will provide the manufacturer partner authorization to use the WaterSense label in conjunction with the certified product. The product certification body shall provide to the manufacturer partner of a certified product, the appropriate graphic artwork of the WaterSense label. Once the use of the WaterSense label has been authorized, the manufacturer partner is allowed to properly label a product that conforms to the WaterSense specification and use the label in promotional materials directly related to the certified product. The manufacturer partner shall at all

times use the label in accordance with the *WaterSense Program Guidelines* and *WaterSense Label Guidelines*.

iv. WaterSense Labeled Product Registry

EPA will maintain an updated list of WaterSense labeled products. The manufacturer partner of a relevant product shall inform EPA when a new product or product model has been certified. EPA will supply a WaterSense product notification form, which is available on the WaterSense Web site at <www.epa.gov/watersense>. Specifically, the manufacturer partner shall provide, at a minimum:

- Manufacturer contact information
- Product brand name, model name, and model number(s)
- Manufacturer partner's URL
- Name of the product certification body, associated file number, and certification date

Each product certification body will also maintain a public listing of all products for which it has authorized the use of the WaterSense label and will periodically update EPA with this list and relevant product certification information so that EPA can maintain a registry of WaterSense labeled products on the WaterSense Web site.

v. Ongoing Surveillance

The product certification body that authorized the use of the WaterSense label is responsible for performing ongoing surveillance of proper label use in the marketplace, proper reference to the label in any promotional materials, and for continued assessment of product conformance to the relevant WaterSense specification. Under the interim approval, the product certification body will perform ongoing surveillance in accordance with its existing ANSI accredited certification scheme. These requirements may include:

- Facility inspections to assess production process and quality management system;
- Product retesting for continued conformance to WaterSense specifications;
- Warehouse/home center inspections for proper label use; and
- File review.

Upon implementation of WaterSense accreditation, the product certification body will follow specific criteria for ongoing surveillance, guided by the WaterSense certification scheme.

D. Suspension and Withdrawal of WaterSense Labeled Products

The product certification body is responsible for determining when the use of the WaterSense label should be suspended or withdrawn due to product nonconformance or improper use of the WaterSense label. Label suspension can occur for a limited period of time as specified by the product certification body. During the period of suspension, the manufacturer partner is

prohibited from using the WaterSense label in conjunction with any product associated with that suspended WaterSense label.

The product certification body will provide the manufacturer partner of a suspended WaterSense label the conditions under which the suspension can be removed (e.g., corrective actions that shall be taken). At the end of the suspension period, the product certification body will investigate whether the indicated conditions for reinstating the WaterSense label have been fulfilled. Upon receiving proof of fulfillment of these conditions, the product certification body will notify the manufacturer partner that the suspension has been removed. The product certification body will notify EPA within 30 days of both WaterSense label suspension and reinstatement.

In more severe or repeated instances of product non-conformity, misuse of the WaterSense label, or failure to meet the requirements for reinstatement of a suspended WaterSense label, the product certification body will withdraw products' certification and the use of the WaterSense label. The product certification body shall inform the manufacturer that the certification and WaterSense label are being withdrawn via a withdrawal notification. If the WaterSense label is withdrawn from a product for any reason, the product certification body will ensure that the manufacturer partner and its wholesalers, distributors, and retailers immediately cease to use the mark in conjunction with that product, and the label must be eliminated from product packaging/promotional materials within six months from the date of withdrawal notification from the product certification body. The product certification body will immediately notify EPA of any product withdrawals and EPA will decide whether termination of the partnership agreement or other corrective action is warranted. The WaterSense label may not be used for any reason by, or in conjunction with a product of, a manufacturer with a terminated partnership agreement.

The product certification body shall bring to EPA's attention, any instances of unauthorized use of a WaterSense label by a manufacturer of a product that has not been certified. EPA will engage in appropriate action with the infringing manufacturer.

When issues related to product non-conformity or improper use of the WaterSense label come to the attention of EPA, EPA will notify the product certification body that authorized the use of the WaterSense label for the product in question. The product certification body will then engage in investigation and resolution of the complaint in accordance with their existing policies and procedures.

II. Interim Requirements and Application Procedures for a Product Certification Body Authorizing the Use of the WaterSense Label on Products for EPA's WaterSense Program

EPA intends to utilize an American National Standards Institute (ANSI) accredited third-party certification program for WaterSense labeled products. In the interim, as the full WaterSense accreditation requirements are developed, WaterSense will rely on current ANSI accredited product certification bodies to certify products in accordance with their existing certification schemes, authorize the use of the WaterSense label, and provide EPA ongoing support as described below.

These application procedures apply only to EPA's interim approval of product certification bodies. Once the full WaterSense accreditation process is established, only a product certification body accredited by ANSI in accordance to the WaterSense certification scheme will be able to certify products to meet WaterSense specifications. This interim approval process will no longer be applicable.

A. Interim Application Procedures and Approval by EPA

In order for a product certification body to certify products to WaterSense specifications during the interim period, it must submit an application to EPA and receive approval. The application shall include the following documentation:

i. A letter declaring intent to participate in the WaterSense program as a Product Certification Body

The letter shall contain declarations and/or attached documentation to support the following requirements:

- Shall demonstrate that it is accredited by ANSI in accordance with ISO/IEC Guide 65, *General requirements for bodies operating product certification systems*;
- Shall have plumbing products or other product categories directly related to WaterSense specifications included in its scope of accreditation;
- Shall declare that the laboratories used by the product certification body have the competence and capability to conduct tests in accordance with relevant WaterSense specifications;
- Shall declare that it has the technical expertise required in the evaluation of relevant products for WaterSense;
- Shall declare that its ongoing surveillance requirements of products for WaterSense will be equivalent to current surveillance requirements for the certification of similar products; and
- Shall indicate which WaterSense specification(s) are relevant to its current ANSI accredited scope.

ii. A signed copy of a licensing agreement

A copy of the licensing agreement may be obtained from WaterSense program staff.

iii. A copy of the label the Product Certification Body intends to use in conjunction with WaterSense labeled products

The product certification body shall provide a unique identifier to be displayed in conjunction with the WaterSense label. An example of the label format with a Product Certification Body Identifier is provided in *Appendix B*. The identifier shall be the product certification body's registered name or official acronym and shall be formatted and centered directly beneath the WaterSense label. The identifier shall be legible and shall be no wider than the WaterSense label itself. EPA will provide to the product

certification body a copy of the label the product certification body shall authorize manufacturers to use in conjunction with WaterSense labeled products.

Once EPA has received the above documentation, it will sign the licensing agreement and return a copy to the applicant product certification body. Upon receipt of a fully executed licensing agreement, the product certification body will be approved to certify and authorize use of the WaterSense label on products for the WaterSense program. The licensing agreement will become null and void at the conclusion of the interim approval process.

B. Certification Requirements

Under the interim approval process, an EPA approved product certification body will certify products and provide WaterSense label and promotional material surveillance in accordance with its current ANSI accredited certification scheme. In addition to the product certification body's existing certification procedures, the following apply:

i. Manufacturers Partnership Agreement with EPA

Manufacturers are required to sign a partnership agreement with EPA as a condition for applying for the WaterSense label. EPA will rely on the product certification body to verify that this partnership agreement is in place prior to authorizing the use of the WaterSense label.

ii. Initial Production Inspection

The WaterSense program does not require an initial production inspection for products currently certified for sale in the United States. If the product certification body has no prior certification relationship with the manufacturer in the specific product area, the product certification body may conduct an initial production inspection at its own discretion to assess the manufacturer's capability for production and quality management.

iii. Initial Product Testing and Authorization to Use of the WaterSense Label

Under the interim approval, the product certification body will sample, test, and certify products in accordance with its existing ANSI accredited certification scheme and the relevant WaterSense specification. Upon implementation of WaterSense accreditation, the product certification body will sample, test, and certify products in accordance with the WaterSense certification scheme and the relevant WaterSense specification.

Once the product certification body has certified that the product conforms to the relevant WaterSense specification, it will provide the manufacturer partner authorization to use the WaterSense label in conjunction with the certified product. The product certification body shall provide to the manufacturer partner of a certified product, the appropriate WaterSense graphic artwork, which shall be collocated with the product certification body's own unique identifier, as described in *Section II.A.iii*. Once the use of the WaterSense label has been authorized, the manufacturer partner is allowed to

properly label a product that conforms to the WaterSense specification, and use the label in promotional materials directly related to the certified product. The product certification body shall ensure that the manufacturer partner uses the label in accordance with the *WaterSense Program Guidelines* and *WaterSense Label Guidelines*.

iv. Ongoing Surveillance

The product certification body will perform ongoing surveillance of proper label use in the marketplace, proper reference to the label in any promotional materials, and for continued assessment of product conformance to the relevant WaterSense specification for any products that it has certified. Under the interim approval, the product certification body will perform ongoing surveillance in accordance with its existing ANSI accredited certification scheme.

Upon implementation of WaterSense accreditation, the product certification body will follow specific criteria for ongoing surveillance, guided by the WaterSense certification scheme.

C. Ongoing Support

Under the interim approval process, EPA anticipates that the product certification body will provide ongoing support in the following areas:

i. Provide data on certified products

The product certification body shall maintain a listing of all WaterSense labeled products on their respective Web sites. In addition, EPA will require the product certification body to submit an updated list monthly so that EPA's WaterSense Web registry remains current. The data shall be provided to EPA in a format compatible with the WaterSense Web registry database. The data provided to EPA shall include:

- Manufacturer name and contact information;
- Brand/model/model number;
- Certification file number; and
- Certification date.

ii. Provide EPA with an annual report

The report shall be made on a form provided by EPA and shall contain information regarding numbers of products tested, certified, failed, or reinstated. In addition, the annual report shall contain a summary of common label misuse or dispute actions. EPA may utilize this information to generally track the certifications of specific products and evaluate the effectiveness and continued applicability of its WaterSense specifications.

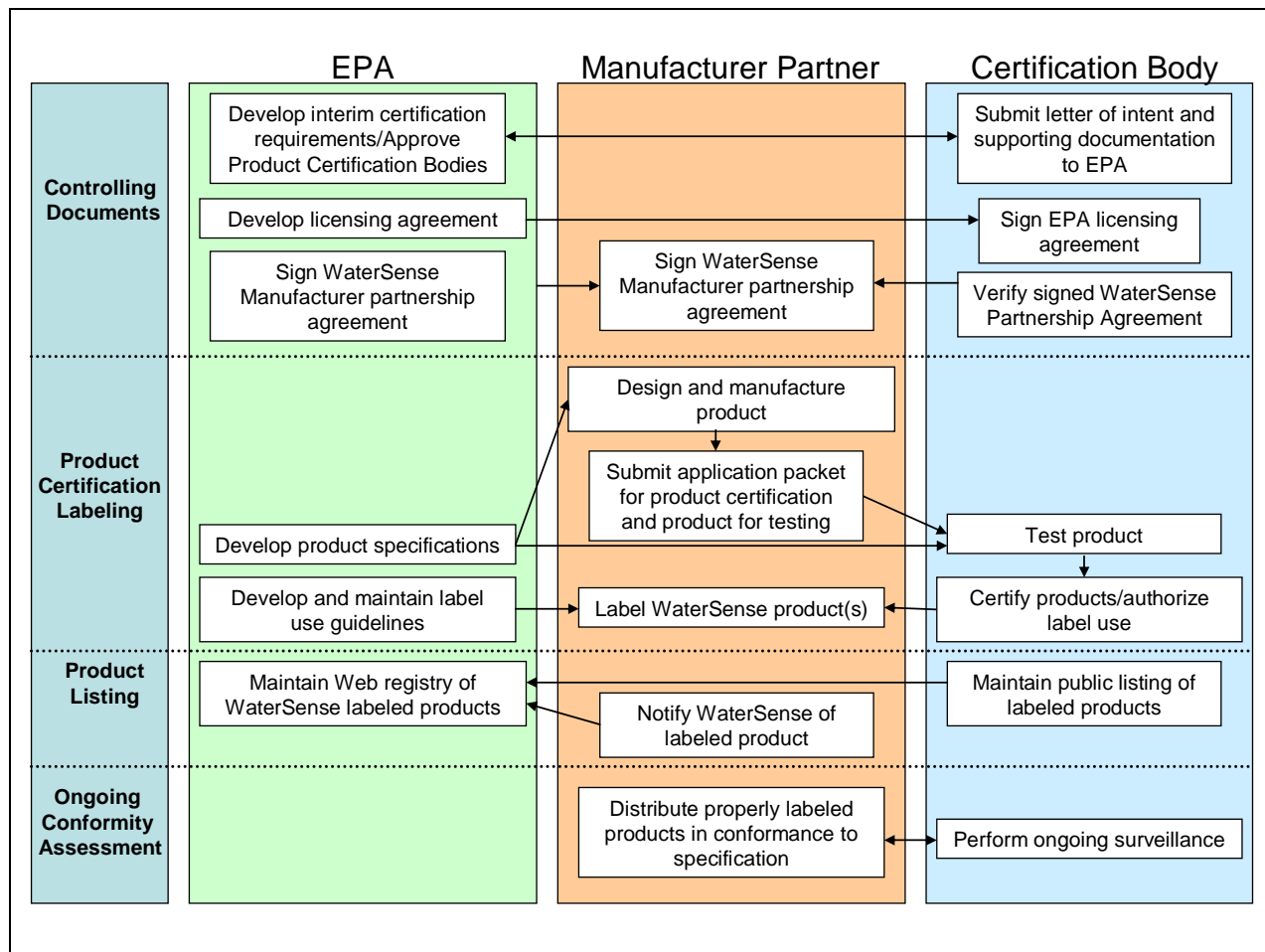
iii. Notify EPA of any WaterSense label suspensions or withdrawals

EPA will rely on the product certification body to handle product nonconformance, label misuse, and dispute resolution. Accordingly, EPA will rely on the product certification body to provide EPA with notification of any WaterSense label suspensions or withdrawals, within 30 days of occurrence.

iv. Allow EPA to accompany accreditation organization on routine assessments

EPA reserves the right, for its staff or its agents, to accompany the accreditation organization on any routine or follow-up assessments of the product certification body's accreditation as it relates to the WaterSense program.

Figure A-1. Interim Product Certification Process Flow Diagram



WaterSenseSM Program Guidelines

Appendix B—Sample of WaterSense Label with Product Certification Body Identifier

Licensed Product Certification Body Label Identifier Specifications:



WaterSense Label at 2 inches:
 "Certified by" set in
 Helvetica Light Standard Condensed
 not to exceed 10 point
 Company name set in
 Helvetica Light Standard Condensed
 not to exceed 12 point
 Center within the dotted gray border below logo.
 2 color printing: Pantone 641 Blue / Pantone 364 Green
 CMYK printing: DS 219-2 (80/30/3/15) Blue / DS 289-2 (60/0/80/35) Green
 RGB: 0/127/178 Blue / 73/137/73 Green



Minimum Size
 WaterSense Label at 1 inch:
 "Certified by" set in
 Helvetica Light Standard Condensed
 not to exceed 5 point
 Company name set in
 Helvetica Light Standard Condensed
 not to exceed 6 point
 Center within the dotted gray border below logo.
 2 color printing: Pantone 641 Blue / Pantone 364 Green
 CMYK printing: DS 219-2 (80/30/3/15) Blue / DS 289-2 (60/0/80/35) Green
 RGB: 0/127/178 Blue / 73/137/73 Green



WaterSense Label at 2 inches:
 "Certified by" and Company name set in alternative font
 if Helvetica Light Standard Condensed is not available
 Arial Narrow
 "Certified by" not to exceed 10 point
 Company name not to exceed 12 point
 Center within the dotted gray border below logo.
 2 color printing: Pantone 641 Blue / Pantone 364 Green
 CMYK printing: DS 219-2 (80/30/3/15) Blue / DS 289-2 (60/0/80/35) Green
 RGB: 0/127/178 Blue / 73/137/73 Green

Licensed Product Certification Body Label Identifier Specifications (black or one color):



WaterSense Label at 2 inches:
 "Certified by" set in
 Helvetica Light Standard Condensed
 not to exceed 10 point
 Company name set in
 Helvetica Light Standard Condensed
 not to exceed 12 point
 Center within the dotted gray border below logo.



Minimum Size
 WaterSense Label at 1 inch:
 "Certified by" set in
 Helvetica Light Standard Condensed
 not to exceed 5 point
 Company name set in
 Helvetica Light Standard Condensed
 not to exceed 6 point
 Center within the dotted gray border below logo.



WaterSense Label at 2 inches:
 "Certified by" and Company name set in alternative font
 if Helvetica Light Standard Condensed is not available
 Arial Narrow
 "Certified by" not to exceed 10 point
 Company name not to exceed 12 point
 Center within the dotted gray border below logo.